

**CRITCHLEY, KINUM & LURIA, LLC**

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*Attorneys for Defendant, Jennifer Johnson*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

CC FORD GROUP, LLC,

Plaintiff,

v.

JENNIFER JOHNSON,

Defendant.

CIVIL ACTION NO.: 3:22-cv-04143

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1441(a) and 1332, Defendant Jennifer Johnson, by and through her undersigned attorneys, hereby removes this action from the Superior Court of New Jersey, Somerset County, to the United States District Court for the District of New Jersey. Pursuant to 28 U.S.C. § 1446, Defendant makes the following short and plain statement of the grounds for removal:

**INTRODUCTION**

1. On May 16, 2022, Plaintiff commenced a civil action against Defendant in the Superior Court of New Jersey, Somerset County. A true and accurate copy of the Summons, filed Complaint, Civil Case Information Statement and Track Assignment Notice are attached as **Exhibit A**.

2. On May 23, 2022, Plaintiff was served with the Summons, Complaint, Civil Case Information Statement and Track Assignment Notice.

3. This is a civil action over which this Court has original jurisdiction based on diversity pursuant to 28 U.S.C. § 1332 and which may be removed by Defendant to this Court pursuant to 28 U.S.C. § 1441(a) because it is a civil action between citizens of different states and the amount in controversy exceeds the sum of \$75,000 exclusive of interest and costs.

#### **DIVERSITY OF CITIZENSHIP**

4. Plaintiff, CC Ford Group LLC, is a limited liability company organized under the laws of New Jersey and having a principal place of business at 150 Morristown Road, Suite 102, Bernardsville, NJ 07924.

5. The members of CC Ford Group LLC are John Studdiford and Cathleen Studdiford, both of whom are residents of Florida.

6. Defendant Jennifer Johnson is a resident of New York, residing at 78 Allview Avenue, Brewster, NY 10509.

7. Accordingly, diversity of citizenship exists pursuant to 28 U.S.C. § 1332(a) because this action is between citizens of different states. The parties were citizens of different states at the time Plaintiff's Complaint was filed in the state action.

#### **AMOUNT IN CONTROVERSY**

8. Plaintiff asserts the following claims against Defendant: breach of contract, breach of fiduciary duty, tortious interference with existing business relationships, tortious interference with prospective economic advantage and trespass to chattel.

9. It is apparent on the face of the Complaint that Plaintiff is seeking damages in excess of \$75,000. Plaintiff demands judgment for compensatory and consequential damages, punitive damages, reimbursement of wages, and attorneys' fees and costs against Defendant.

### CONCLUSION

10. Accordingly, removal to the United States District Court for the District of New Jersey is proper pursuant to 28 U.S.C. §§ 1441(a) and 1332.

11. Removal to the United States District Court for the District of New Jersey is appropriate because this action is being removed from the Superior Court of New Jersey, Somerset County, which is located with the District of New Jersey.

12. This Notice of Removal is signed pursuant to Fed. R. Civ. P. 11 and is timely filed within 30 days after the date the Removing Defendant received service of Plaintiff's Complaint and Summons.

13. A true and accurate copy of this Notice of Removal will be filed with the Clerk of the Superior Court of the State of New Jersey, Somerset County, and served upon counsel for Plaintiff.

14. In filing this Notice of Removal, Defendant does not waive and specifically reserves, all defenses, exceptions, rights and motions.

15. If any question arises as to the propriety of the removal of this action, the Removing Defendant respectfully requests the opportunity to present a brief and oral argument in support of its position that this case is removable.

WHEREFORE, Defendant respectfully gives notice of removal of the state action herein from the Superior Court of the State of New Jersey, Somerset County, to the United States District Court for the District of New Jersey

CRITCHLEY, KINUM & LURIA, LLC  
Attorneys for Defendant Jennifer Johnson

/s/ Amy Luria

By: AMY LURIA, ESQ.

Dated: June 17, 2022

**LOCAL RULE 11.2 CERTIFICATION**

I hereby certify that the matter in controversy in this action is not known to me to be the subject of any other action pending in any Court (other than the state court action removed hereby) or of any pending arbitration or administrative proceeding.

CRITCHLEY, KINUM & LURIA, LLC  
Attorneys for Defendant, Jennifer Johnson

/s/ Amy Luria

By: AMY LURIA, ESQ.

Dated: June 17, 2022